

EXHIBIT 2

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERRORIST ATTACKS : 03-MDL-1570
ON SEPTEMBER 11, 2001 : (GBD) (SN)

- - -

APRIL 20, 2021
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MOHAMMEDI, LLC</p> <p>21 BY: STEVE SIEGLER, ESQUIRE</p> <p>22 233 Broadway</p> <p>23 Suite 820</p> <p>24 New York, New York 10279</p> <p>25 (212) 725-3846</p> <p>26 ssiegler@otmlaw.com</p> <p>27 Representing the Defendant,</p> <p>28 WAMY and WAMY International</p> <p>29</p> <p>30</p> <p>31</p> <p>32</p> <p>33</p> <p>34</p> <p>35</p> <p>36</p> <p>37</p> <p>38</p> <p>39</p> <p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p> <p>47</p> <p>48</p> <p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p> <p>58</p> <p>59</p> <p>60</p> <p>61</p> <p>62</p> <p>63</p> <p>64</p> <p>65</p> <p>66</p> <p>67</p> <p>68</p> <p>69</p> <p>70</p> <p>71</p> <p>72</p> <p>73</p> <p>74</p> <p>75</p> <p>76</p> <p>77</p> <p>78</p> <p>79</p> <p>80</p> <p>81</p> <p>82</p> <p>83</p> <p>84</p> <p>85</p> <p>86</p> <p>87</p> <p>88</p> <p>89</p> <p>90</p> <p>91</p> <p>92</p> <p>93</p> <p>94</p> <p>95</p> <p>96</p> <p>97</p> <p>98</p> <p>99</p> <p>100</p> <p>101</p> <p>102</p> <p>103</p> <p>104</p> <p>105</p> <p>106</p> <p>107</p> <p>108</p> <p>109</p> <p>110</p> <p>111</p> <p>112</p> <p>113</p> <p>114</p> <p>115</p> <p>116</p> <p>117</p> <p>118</p> <p>119</p> <p>120</p> <p>121</p> <p>122</p> <p>123</p> <p>124</p> <p>125</p> <p>126</p> <p>127</p> <p>128</p> <p>129</p> <p>130</p> <p>131</p> <p>132</p> <p>133</p> <p>134</p> <p>135</p> <p>136</p> <p>137</p> <p>138</p> <p>139</p> <p>140</p> <p>141</p> <p>142</p> <p>143</p> <p>144</p> <p>145</p> <p>146</p> <p>147</p> <p>148</p> <p>149</p> <p>150</p> <p>151</p> <p>152</p> <p>153</p> <p>154</p> <p>155</p> <p>156</p> <p>157</p> <p>158</p> <p>159</p> <p>160</p> <p>161</p> <p>162</p> <p>163</p> <p>164</p> <p>165</p> <p>166</p> <p>167</p> <p>168</p> <p>169</p> <p>170</p> <p>171</p> <p>172</p> <p>173</p> <p>174</p> <p>175</p> <p>176</p> <p>177</p> <p>178</p> <p>179</p> <p>180</p> <p>181</p> <p>182</p> <p>183</p> <p>184</p> <p>185</p> <p>186</p> <p>187</p> <p>188</p> <p>189</p> <p>190</p> <p>191</p> <p>192</p> <p>193</p> <p>194</p> <p>195</p> <p>196</p> <p>197</p> <p>198</p> <p>199</p> <p>200</p> <p>201</p> <p>202</p> <p>203</p> <p>204</p> <p>205</p> <p>206</p> <p>207</p> <p>208</p> <p>209</p> <p>210</p> <p>211</p> <p>212</p> <p>213</p> <p>214</p> <p>215</p> <p>216</p> <p>217</p> <p>218</p> <p>219</p> <p>220</p> <p>221</p> <p>222</p> <p>223</p> <p>224</p> <p>225</p> <p>226</p> <p>227</p> <p>228</p> <p>229</p> <p>230</p> <p>231</p> <p>232</p> <p>233</p> <p>234</p> <p>235</p> <p>236</p> <p>237</p> <p>238</p> <p>239</p> <p>240</p> <p>241</p> <p>242</p> <p>243</p> <p>244</p> <p>245</p> <p>246</p> <p>247</p> <p>248</p> <p>249</p> <p>250</p> <p>251</p> <p>252</p> <p>253</p> <p>254</p> <p>255</p> <p>256</p> <p>257</p> <p>258</p> <p>259</p> <p>260</p> <p>261</p> <p>262</p> <p>263</p> <p>264</p> <p>265</p> <p>266</p> <p>267</p> <p>268</p> <p>269</p> <p>270</p> <p>271</p> <p>272</p> <p>273</p> <p>274</p> <p>275</p> <p>276</p> <p>277</p> <p>278</p> <p>279</p> <p>280</p> <p>281</p> <p>282</p> <p>283</p> <p>284</p> <p>285</p> <p>286</p> <p>287</p> <p>288</p> <p>289</p> <p>290</p> <p>291</p> <p>292</p> <p>293</p> <p>294</p> <p>295</p> <p>296</p> <p>297</p> <p>298</p> <p>299</p> <p>300</p> <p>301</p> <p>302</p> <p>303</p> <p>304</p> <p>305</p> <p>306</p> <p>307</p> <p>308</p> <p>309</p> <p>310</p> <p>311</p> <p>312</p> <p>313</p> <p>314</p> <p>315</p> <p>316</p> <p>317</p> <p>318</p> <p>319</p> <p>320</p> <p>321</p> <p>322</p> <p>323</p> <p>324</p> <p>325</p> <p>326</p> <p>327</p> <p>328</p>

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<p>1 - - -</p> <p>2 E X H I B I T S</p> <p>3 - - -</p> <p>4</p> <p>5 NO. DESCRIPTION PAGE</p> <p>6 Roy-594 BOS000001-003</p> <p>7 List of Names 193</p> <p>8 Roy-595 PEC-KSA001453-1454</p> <p>9 WikiLeaks Diplomatic Cable 197</p> <p>10 Roy-596 No Bates</p> <p>11 Guardian Article, Who Are</p> <p>12 the New Jihadis? 202</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1 - - -</p> <p>2 (It is hereby stipulated and</p> <p>3 agreed by and among counsel that</p> <p>4 sealing, filing and certification</p> <p>5 are waived; and that all</p> <p>6 objections, except as to the form</p> <p>7 of the question, will be reserved</p> <p>8 until the time of trial.)</p> <p>9 - - -</p> <p>10 VIDEO TECHNICIAN: We are</p> <p>11 now on the record. My name is</p> <p>12 David Lane, videographer for</p> <p>13 Golkow Litigation Services.</p> <p>14 Today's date is April 20th, 2021.</p> <p>15 Our time is 7:04 a.m. Eastern</p> <p>16 Standard Time.</p> <p>17 This remote video deposition</p> <p>18 is being held in the matter of the</p> <p>19 Terrorist Attacks on September</p> <p>20 11th, 2011, MDL 1570.</p> <p>21 The deponent today is Dr.</p> <p>22 Olivier Roy. All parties to this</p> <p>23 deposition are appearing remotely</p> <p>24 and have agreed to the witness</p>

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<p>1 being sworn in remotely. 2 Due to the nature of remote 3 reporting, please pause briefly 4 before speaking to ensure all 5 parties are heard completely. 6 Counsel will be noted on the 7 stenographic record. The court 8 reporter today is Amanda Miller 9 and will now swear in the witness. 10 - - - 11 OLIVIER ROY, after having 12 been duly sworn, was examined and 13 testified as follows: 14 - - - 15 VIDEO TECHNICIAN: Please 16 begin. 17 - - - 18 EXAMINATION 19 - - - 20 BY MR. EUBANKS: 21 Q. Good morning for us on the 22 East Coast, and I believe it's good 23 afternoon for you in Italy; is that 24 correct, Professor Roy?</p>	<p>1 (Whereupon, Exhibit Roy-587, 2 No Bates, Notice of Oral 3 Deposition of Olivier Roy, was 4 marked for identification.) 5 - - - 6 BY MR. EUBANKS: 7 Q. Now, Professor, you're being 8 shown what's being marked as Exhibit-587. 9 This is the notice of oral deposition for 10 Olivier Roy? 11 A. Yeah. 12 Q. Have you seen this document 13 before? 14 A. Yeah, just -- yeah. 15 Q. Okay. So you are familiar 16 with it. 17 And this is the document 18 that is -- that has us sitting here today 19 to take your deposition; is that correct? 20 A. Yes. Correct. 21 Q. And before we get started 22 today, I want to go over some of the sort 23 of ground rules for how we'll proceed 24 today.</p>
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<p>1 A. Yes. 2 Q. Can you please state your 3 name and the location where you're being 4 deposed today for the record? 5 A. My name is Olivier Roy. I 6 am in Florence, Florencia, in Italy. 7 Q. My name is John Eubanks. I 8 am one of the attorneys for the 9 plaintiffs in this litigation, with the 10 law firm of Motley Rice. We're located 11 in South Carolina. 12 And I'm going to be asking 13 you some questions today. And I don't 14 want you to feel too uncomfortable. I 15 know that this is not the normal type of 16 proceeding or normal type of conversation 17 that you would normally have. But at the 18 same time, I want you to be as 19 comfortable as you can be, given the 20 circumstances. 21 MR. EUBANKS: If I could 22 have Document Number 1 marked as 23 Exhibit-587. 24 - - -</p>	<p>1 Now, I'm going to be asking 2 you questions. And if you can simply 3 wait until I am finished asking any 4 question before you begin responding, it 5 will make things easier for Amanda, our 6 court reporter today. 7 In addition, if something I 8 ask does not seem clear to you, if there 9 seems to be two meanings that could be 10 taken for what I'm asking, please don't 11 answer the question; ask me to repeat it 12 or to clarify it. 13 The last thing I want you to 14 do is answer a question that you don't 15 understand or that isn't what I'm asking. 16 If you need me to rephrase 17 it, just please just ask me to rephrase. 18 I have no problem with that. 19 But if you do answer a 20 question, I will presume that you've 21 understood the question as it was asked. 22 Is that clear? 23 A. Clear. 24 Q. Okay. Before you respond to</p>